

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)
)
Plaintiff,) No. CR 15-4268 JB
) No. CR 16-1613 JB
vs.)
)
ANTHONY RAY BACA, a.k.a. "Pup,")
SERGIO LOYA RODRIGUEZ, a.k.a.)
"Churro,")
MANUEL BENITO, a.k.a. "Panther,")
VINCENT GARDUÑO, a.k.a. "Fatal,")
)
Defendants.)

**UNITED STATES' UNOPPOSED MOTION FOR
PERMISSION TO FILE OMNIBUS RESPONSE**

The United States seeks permission to file an omnibus response to motions and briefs defendants Anthony Ray Baca, a.k.a. "Pup," Sergio Loya Rodriguez, a.k.a. "Churro," Manuel Benito, a.k.a. "Panther," and Vincent Garduño, a.k.a. "Fatal," have filed in cause numbers CR 15-4268 and CR 16-1613. The United States' motion is based on the following:

1. Starting on January 1, 2017 and ending in January 18, 2017, the aforementioned Defendants filed several motions and briefs. Each defendant joined in various of the motions filed by the other. The United States has identified several motions and briefs among this group that cite much of the same law, raise many of the same issues, and request similar relief. If the United States were to respond to each of these individually, it would recite much of the same law and set forth many of the same arguments to the Court many different times. As a result, the United States believes it would be more efficient to the Court and the parties to file one omnibus response addressing these motions and briefs rather than separate, often overlapping responses. In addition, several of the other defense filings also could be addressed more efficiently in this omnibus response.

2. The motions and briefs the United States would address in its omnibus response are as follows:
 - A. Defendant Manuel Benito's Opposed Motion to Compel Disclosure of Confidential Informant Identities [No. CR 16-1613, Doc. 290]
 - B. Defendant Sergio Loya Rodriguez's Motion to Compel the Government to Disclose the Identities of Confidential Informants Referenced in Discovery Materials [No. CR 16-1613, Doc. 295]
 - C. Supplemental Briefing in Support of Defendants' Opposed Motion to Compel the Production of Unredacted Discovery and the Identification of Confidential Informants [No. CR 16-1613, Doc. 296]
 - D. Sealed Supplemental Brief in Support of Motion to Compel the Identification of Confidential Informants [No. CR 15-4268, Doc. 829; No. CR 16-1613, Doc. 298]
3. The United States' responses are due on February 3, 2017.
4. All Defendants who are associated with the above motions do not

oppose the authorization the United States seeks in this motion.

WHEREFORE, for the foregoing reasons, the United States respectfully requests that the Court enter an order permitting the United States to file one omnibus response, with respect to the defense filings set forth in this document.

Respectfully Submitted,

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United States Attorney

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I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification to defense counsel of record on this date.

/s/

MATTHEW M. BECK
Assistant United States Attorney